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Attorneys for Defendant  
HONEYWELL INTERNATIONAL, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

DEBORAH GETZ, individually and as a surviving  
heir of decedent KRISTOFER D. S. THOMAS;  
RODNEY THOMAS, individually and as a  
surviving heir of decedent, KRISTOFER D. S.  
THOMAS; MARY DUFFMAN, individually and  
as a surviving heir of decedent, SCOTT E.  
DUFFMAN; SOPHIA DUFFMAN, a minor,  
individually and as a surviving heir of decedent  
SCOTT E. DUFFMAN, by and through her  
Guardian ad Litem, MARY DUFFMAN;  
CHRISTINE VAUGHN, individually and as a  
surviving heir of decedent, TRAVIS R.  
VAUGHN; BRAD VAUGHN, individually and as  
a surviving heir of decedent, TRAVIS R.  
VAUGHN; JILL GARBS, individually and as a  
surviving heir of decedent RYAN GARBS;  
DOUG GARBS, individually and as a surviving  
heir of decedent, RYAN GARBS; JORDAN  
LANHAM; JERRY GOLDSMITH; RYANNE  
NOSS, individually and as spouse of SCOT  
NOSS; TIMOTHY BRAUCH; CHRIS TRISKO,  
MARK DANIEL HOUGHTON,

Plaintiffs,

v.

Case No. CV 07-6396 CW

**DECLARATION OF MARLIN  
KRUSE IN SUPPORT OF  
HONEYWELL INTERNATIONAL  
INC'S MOTION TO TRANSFER  
VENUE**

1 THE BOEING COMPANY, a corporation;  
2 HONEYWELL INTERNATIONAL, INC., a  
3 corporation; GOODRICH CORPORATION, a  
4 corporation; BF GOODRICH AEROSPACE;  
5 CHANDLER EVANS CONTROL SYSTEMS;  
6 GENERAL ELECTRIC and DOES 1 through 200,  
7 inclusive,

8 Defendants.

9 I, Marlin Kruse, declare as follows:

10 1. I am a Principal Engineer at Honeywell International Inc. ("Honeywell") in the  
11 Product Integrity department. My work responsibilities include accident investigation, litigation  
12 support, and corrective action oversight. I have worked at Honeywell for over ten years.  
13 Statements made in this declaration are based on my personal knowledge, and I could and would  
14 so testify if called as a witness in this matter.

15 2. I am the focal point person for the investigation activities at Honeywell involving a  
16 Chinook MH-47E helicopter bearing tail number 92-00472 ("subject helicopter"), which crashed  
17 in Afghanistan on or about February 17-18, 2007.

18 3. Honeywell manufactured the two T55-GA-714A engines, the engines installed on  
19 the subject helicopter, in its engine manufacturing facility in Phoenix, Arizona.

20 4. The subject helicopter was operated by the U.S. Army 160<sup>th</sup> SOAR - Special  
21 Operations Aviation Regiment (the "160<sup>th</sup>").

22 5. The 160<sup>th</sup> is a special operations force that provides aviation support for Special  
23 Operations Forces.

24 6. Honeywell has provided technical support to the 160<sup>th</sup> for their investigation of the  
25 subject helicopter crash. I understand that there have been investigation related activities at the  
26 following U.S. Army installations: Fort Campbell, Kentucky (home of the 160<sup>th</sup>), Fort Rucker,  
27 Alabama (location of the U.S. Army Combat Readiness Center, the U.S. Army's principal  
28 aviation accident investigating authority), Redstone, Alabama (AMCOM), and the Corpus Christi  
Army Depot, Texas.

1           7.       After the subject helicopter crashed, the 160<sup>th</sup> was able to recover the engines  
2 installed on the aircraft. The engines and other component parts were transported to Fort  
3 Campbell, Kentucky. Once they were sent to Fort Campbell, Kentucky, the engines and the  
4 engine components were under the control of the 160<sup>th</sup>. Engine control system components were  
5 also transported back to the United States.

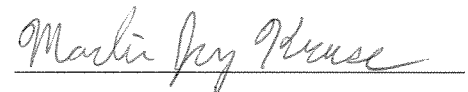
6           8.       As the focal point for Honeywell's support of the 160<sup>th</sup>'s investigation of the  
7 mishap, I was invited to participate in the teardown of the engines at Fort Campbell, Kentucky on  
8 August 7-8, 2007.

9           9.       The ongoing investigation is focused on a possible engine flame-out event.

10          10.       While the physical teardown of the engine has taken place in Fort Campbell,  
11 Kentucky, most of the engineers who are supporting me in analyzing the data gathered from the  
12 investigation of the incident, including the teardown of the engines, are located in Phoenix,  
13 Arizona.

14          11.       Additionally, Honeywell's investigative activities have been focused primarily in  
15 Arizona, including the location of key Honeywell documents and evidence regarding the  
16 investigation.

17           I declare under penalty of perjury under the laws of the United States of America that the  
18 foregoing is true and correct, and that I executed this declaration on January 7, 2008 at Phoenix,  
19 Arizona.

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22 Marlin Kruse  
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